

Comments from Individuals that indicated ‘Do not support’ or ‘Strongly do not support’ the recommendation (231 comments)

- 4844 ratings were submitted across all recommendations by the 178 individuals that rated the recommendations
- 427 of the ratings (8.8%) were ‘Do not support’ or ‘Strongly do not support’
- 231 comments were provided from these 427 ratings

Exp	1: Purposes of accreditation system
IHE Role	
0	The standards that you refer to omit major areas of education that are essential for successful teaching and learning.
0	I do not support the adherence to standards because standards are developed politically and in most cases have nothing to do with reality. All of the rest I strongly agree with.
11.5	Purposes 1 and 3 only.
K-12 Role	
7	These purposes focus on the program. I think the main purpose of accreditation is to ensure the highest quality teachers are available to every student in the public schools in the State of California. I feel the four major purpose statements help achieve the overarching purpose of quality teaching and learning.

Exp	2: Roles and Responsibilities of the Commission and the Committee on Accreditation (COA)
IHE Role	
0	The COA does not always speak for all schools- the imbalance towards state institutions makes it less effective than it might be.
3	Too much power with the CTC and COA - everything should be collaborative. The universities need to assume the primary role of ongoing evaluation. The COA members oftentimes do not know the culture of a university organization, make assumptions based on their own biases or on what they believe should be happening. This is inappropriate and non-productive at the higher education level.
4.5	NCATE works with states to integrate national professional standards and state standards in order to upgrade the quality of teacher preparation in the United States. As of 2005, 36 states have adopted or adapted NCATE unit standards as the state unit standards. Due to the high quality and consequential validity of the NCATE accreditation materials, NCATE standards are increasingly the norm in teacher preparation. NCATE operates as a lever of reform for schools of education. The three states that required NCATE accreditation for all schools of education during the 1980s-Arkansas, North Carolina, and West Virginia-all experienced greater than average increases in student achievement during the 1990s according to test scores in reading and math on the National Assessment of Educational Progress. NCATE's accredited colleges and universities are a diverse group, indicating that all types of institutions can and do meet professional accreditation expectations. NCATE is recognized by policymakers. The National Conference of State Legislatures issued a report that calls NCATE a cost-effective means to upgrade quality in schools of education. The National Commission on Teaching and America's Future recommends that all schools of education be professionally accredited by NCATE.
4.5	The role of national accreditation by professional organizations (e.g., NCATE) needs to be clarified. Current oversight, although portions are mutually accepted, seems somewhat punitive. This may be a case of many people/organizations working on a similar task. Streamlining is needed.
5	The COA has not done in effective job communicating with stakeholders about the process, especially the public. The COA did not object to the suspension of accreditation visits. It seems that the COA is dependent on the Commission. I would urge that COA be expanded--more members-- and a degree of autonomy.

Exp	2: Roles and Responsibilities of the Commission and the Committee on Accreditation (COA)
6.5	The description states that the Commission sets policies for accreditation and the COA implements the Commission's accreditation policies. The COA should also give feed-back to the Commission as to modifications in the accreditation process based on experience with the process.
8.5	With due respect, your questions, for the most part, are like motherhood and apple pie. It's virtually impossible to disagree with any of them. My concern is with the PROCESS that is used. We sometimes feel that we spend more time working on accreditation preparation and approval than we spend on implementing our programs. Three major problems exist: first, the changes that are constantly being made require a new learning curve every time we have to go thru another accreditation. Second, the commission does not have the manpower to respond in a timely fashion. This holds up our ability to deliver in the field because it takes so long to get answer. Finally, and most important, the criteria used by the commission is parallel to the criteria required by other accrediting agencies, eg. NCATE. Why doesn't California save the cost of requiring state certification if we have NCATE? It sometimes seems that we are in the process of perpetuating bureaucracy rather than good education - this isn't meant to sound combative, but the system is so tiring...
9	COA should consider national accreditation in lieu of state accreditation, thus, reducing redundancy and increasing efficiency
9.5	The annual report is adequate, as all agenda are public, as are all meetings of the COA. The Commission can review these at any time. Additionally, key CCTC staff attend both meetings to bring information forward as needed.
11	More frequent communication should be defined as to the expectations beyond the annual report.
11.5	Eliminate K-12 participants.
12	COA composition: total number should be increased to allow sufficient representation of specialties within K-12 and higher education (e.g. special education, administration).
16.5	In a CA maintained accreditation system, I support the role of the COA similar to the position it has held. However, it may be possible to create a program review system managed by the state that can incorporate components of ongoing data based evaluation, and then turn unit accreditation over to NCATE on a seven year cycle. I believe this would maintain the CA sophisticated standards for programs and continue to motivate institutions to meet high standards through NCATE.
18.5	There are several interrelated problems with the COA. First, political advocacy has unduly influenced accreditation decisions. Second, COA members often make accreditation recommendations that are inconsistent with team reports. Third, the COA is an additional layer of bureaucratic review that adds little or no meaning, again other than political or other individual agendas. The team report should stand on it's own and the COA should be eliminated.
22	The COA and the BIR have done their work in an excellent way for years! The Commission, however, has often become too mired in political maneuvering by a recent chair and the CCTC director, engaged in issues far outreaching accreditation of teaching and of educator preparation ihes. In some cases, when BIR recommendations were unfavorable to personal favorites of the chair and/or director, then, somehow recommendations were did not get carried through to the intended level. Appointments to the COA by the Commission members were in keeping with the political nature of their own appointments to the commission. The COA should be an independent body, protected from political pressure from the politically appointed Commission and politically ambitious persons using the commission or COA positions for future career options.
K-12 Role	
0	The topic should continue to be a current annual report: adding more paperwork, visits, etc., only adds to the cost and stress without much improvement.
2	I do not agree with the number of "selected educational leaders." If a group of people is going to make decisions for the entire state, I believe that this group should be composed from educators of all counties in California. This state has a diverse community and all if its need should be meet. The needs of the diverse student population in this state are not being met. A person from Northern California does not know or understand the trans-border population here in San Diego nor does a person who visits for a day or two to review schools. This group needs to be composed of a diverse population in order to meet the needs of everyone.
Public	

Exp	2: Roles and Responsibilities of the Commission and the Committee on Accreditation (COA)
17.5	My experience with the COA has led me to be concerned that the Committee is isolated from the Commission as a whole. I would like to see them be an integral part of the Commission, not a separate entity. Too much temptation to create your own little fiefdom.

Exp	3: Accreditation as an Ongoing Activity
IHE Role	
0	If you were to view accreditation as an ongoing cycle of activities, you would need to create a position at each university that is only involved in this process. By keeping the process to a six-year turnaround, schools have time to implement changes and work on improving the site. By making this ongoing, it seems that standards would be changed monthly or even each semester which makes it difficult for students to finish their credentials and for teachers to focus on their classes and research and only focus on meeting new standards.
0	I believe that it should be accomplished as it was in the past, on a snapshot approach. Too many of the commissioners are influenced politically by special interest groups.
1.5	As the process is currently working, the lag time for accreditation can be up to 2 years. Moreover, there are major deficiencies in the quality and accuracy of reviews because reviewers are not given adequate, or in many cases, any training. Until there are funds to have multiple, qualified and trained reviewers carefully and accurately review programs, it doesn't make sense to increase the frequency of programs reviews. More unreliable and/or invalid assessments only bog down the system.
2	I think the system should stay the same. Once every six years is often enough.
3	1. This sounds like an expensive activity for all involved. 2. This policy would increase the workloads of already overloaded people.
3	While the "snapshot" approach may not be the best, making accreditation activities an ongoing cycle would require additional funding and resources (staff, materials, time). This is unrealistic. Unless universities receive additional funding targeted specifically for ongoing accreditation activities (staff salary, materials, etc), then this is not do-able.
3	This is fine if it is conducted by the sponsoring agency and not with so much control and oversight from an outside agency as the recommendation seems to imply.
4	The reason I do not support this recommendation is that the institutional work will become more about reporting and "weighing the pig" then doing the work of the institution in preparing new teacher. Institutions will not receive any more resources or staffing to do this accountability work so the work of the institution will diminish while the accountability to a 3rd party will increase. Not good. Recommend that a mid cycle visit take place instead.
4.5	The Commission and the Committee on Accreditation may not be considering consequential validity -i.e. by taking efforts away from proven NCATE efforts, our accreditation may actually be diminishing the number of California institutions that improve their quality by meeting NCATE standards. There are very good reasons why NCATE standards are increasingly the norm in teacher preparation.
5	Many credential programs off online (Internet-based) reading methods courses, but is this an adequate way to prepare credential candidates to go forth and teach reading? We should to require colleges and universities to demonstrate the efficacy of online reading methods instruction. I happen to know that National University collects data on RICA passage rates at all National U. campuses across the state of California. They prepare confidential reports comparing passage rates from campus to campus, from instructor to instructor, and can compare RICA passage rates of online classes to the RICA passage rates of regular classes. THEY REFUSE TO RELEASE THE DATA online versus face-to-face instruction data and I know because I have repeatedly applied for access to their data set. National University recommends the most credential candidates in the state and their online courses are HUGELY profitable. It seems to me that National University would be delighted to release this data and prove that online instruction in reading methods is at least as effective as regular (face-to-face) instruction IF IT WAS. Since they refuse access to their data set, it should raise questions. The Commission should look into this and require online credential programs to provide RICA passage rate information for their online classes. Actually, the BEST way to gather this data, however, would be to require the Reading Instruction Competence Assessment test administration company (see www.rica.nesinc.com) to ask

Exp	3: Accreditation as an Ongoing Activity
	applicants to indicate on the application form whether they took their class online or face-to-face in a classroom setting. I wrote letters repeatedly about four years ago asking the Commission testing division folks to work with me on this research, but couldn't get anyone interested. It's a worthy question, especially in light of the recent state and national focus on reading and teaching. Please let me know if I can participate in research or data collection on this issue!
5	The accreditation process as it stands now is an already onerous process in a system that lacks sufficient resources to adequately collect and analyze data sources. While program improvement may internally be an on-going process, accreditation is not. Were the state to provide on-going support for on-going improvement, rather than simply more and more hurdle, that would be wonderful. However, there is a great concern that the processes of documentation will take more and more of faculty time, in the service of collecting data. And, given that time is finite, it is far better spent in the service of teaching teachers rather than saying that we did so with elegant charts and graphs. We have already begun to see the effects of such policies in the K-12 schools where teachers are filling out forms to say that a standard was covered by the letter of the law, but not the spirit of the law. This is not anything I would ever support.
5	The responsibility is to ensure that programs meet minimum standards. There is too great a danger that the system will become overly prescriptive and that the ongoing data collection will support standardization, only one prescriptive delivery of the credential program substantively and ideologically. This is dangerous. There is not one best way to meet the Standards for all institutions. This is a breach of academic freedom and subverts the idea that there are multiple ways to meet the standards.
7	First of all, I would like to see accreditation visits occur more frequently than every six years -- every four or maybe every five years would be more acceptable. On-going reports and data driven decision making are great in theory; however, there are problems in practice. First of all, collecting, analyzing, and reporting the data every year could be an overwhelming requirement that, for small, thinly staffed, and poorly funded programs, can get in the way of actually working with the credential candidates. Further, there is no assurance that anyone will actually review the annual reports until the time comes for re-accreditation. I would support fewer reports in a cycle to coincide with substantive and thoughtful review. And, that cycle should occur more frequently than once every six or seven years.
8.5	The idea is a good one. Based on my experience, I am fearful that what would be required would be unwieldy. If a practical and useful system could be put into place - such as peer review - perhaps three institutions act as a cohort and review/critique each other's, one every third year, I would be for it. This would allow us to learn and grow from each other, promote local opportunities, and stay on track. We could learn from each other. A report could be sent to CCTC to keep you abreast. If you go with what you've traditionally done, it will only cause more paperwork for us. Those at CCTC are great people, but what they do each day is different from what we do each day and the chance to grow from our interactions isn't as great as a peer review would provide.
9.5	Universities should regard ongoing assessment as a part of the University's activity. However, data should be made public during accreditation when long term trends can be determined. A two year cycle does not give adequate time to address trends and is too narrow a focus.
11.5	An accreditation review every seven years is sufficient. On-site visitations are unnecessary.
11.5	While I do believe that program improvement is an on-going process, I am concerned with a prescribed system of data collection that mandates a specific type of data driven decision making. I also think the snapshot approach is adequate and appropriate. Having served on multiple and varied BIR site visits, I believe the snapshot approach allowed the team to understand the program quite well. Any improvements that are made between such visits can be documented and available to team members and would contribute to the whole picture, thereby making more than snapshot.
11.5	No aspect of university has as many outside mandates which require response as a school of Education. Having to submit the ongoing data we already report to NCATE and CCTC is acceptable and we can tolerate the visit cycle. Having to replicate the effort for the cyclical evaluation annually is just overwhelming. The current system has not stopped Chapman or National to sell credentials and graduate degrees. Do you think annual reports will do so? They just make more and more work for colleges...work that does not improve practice. We constantly reflect on the data we gather and institute changes and improvements. The same is true of almost all legitimate programs. Adding another annual layer to this process won't help us and since even the snap shot approach does not stop the 'for profits'...why subject us to this extra effort.

Exp	3: Accreditation as an Ongoing Activity
12	Periodic accreditation is already quite burdensome, probably overly so. Ongoing activity is highly likely only to increase burden rather than spread it out. There should be provision for ongoing or between-cycle engagement with programs in difficulty, but not otherwise.
12.5	Additional reporting requirements takes up the already limited resources of credentialing programs. Reports become an end to themselves with little value in program improvement.
13.5	The current system provides institutions ample time to refine/revise their programs without undue documentation burdens. Additional requirements would be an undue burden without significant benefits. I would support a provision allowing periodic accreditation due to program quality issues that come to the attention of the COA.
14	I do not believe that it is the responsibility of the Commission (or other accreditation body) to monitor universities' systems of formative assessment. Universities and other bodies that have been accredited should be responsible to put into place working systems of systemic evaluation, and these systems should be evident at the point of accreditation. I think that asking the accreditation body to monitor the universities in an ongoing manner is overstepping both the role and the resources of the accreditation body.
14.5	I believe that the idea as a whole is a good one. However, my area of communicative disorders already submits an annual report to ASHA. It would make sense if institutions could send their annual report to ASHA to CCTC as well; however, I fear that that will not happen. An additional annual report would just be extra paperwork and time not devoted to teaching students for communicative disorders programs. In addition, I receive no release time for coordinating the Clinical Rehabilitative Services Credential in Language, Speech, and Hearing at my institution except for a release to write the accreditation report for CCTC every 5-6 years. This will just be extra work time taken away from my students and, possibly, largely duplicated information.
15	There are many other accountability activities in universities--WASC and internal program review to name two labor-intensive ones. To add additional reporting requirements may be onerous.
18.5	I do not believe that this is a question of one exclusive model or another. The current system has a strong basis in the on-site review by college and k-12 educators. Describing this as merely a "snapshot" approach demeans the significance of this comprehensive review. On the other hand, an on-going approach might also make the review process more educational and developmental and less regulatory and punitive than the current system. However, the words "accountability, meeting standards, and data-driven decision making" reflect a mechanistic, behavioral, and politically conservative agenda. Thus, I do not support the recommendation because of the manner in which it's framed.
19	The current system is not able to maintain the current level of review because of budget problems and the inability to recruit and train enough people for the BIR so I think the plan to review data more often is not well considered. Further, I doubt the ability of the CCTC to recruit and retain the quality of staff necessary to do the required analysis.
K-12 Role	
0	Each review needs to stand on its own merit to assure a quality program.

Exp	3: Accreditation as an Ongoing Activity
2	I went through the process of accreditation at a private school I worked at. Our six years was up, and we went through the process again and gained accreditation for another six years. I felt (and still feel) that it is a good system. As a school, we are always looking at our standards, decisions, and practices. We then make changes where needed. It was a lot of work on the school's part to prepare for a site visit. And, I'm sure it was a lot of work on the part of WASC to prepare as well. This recommendation seems to ask schools to do more work, when they are already doing so much. I heard an administrator make a very wise comment, and I think it something that all administrators and those in charge of schools should keep in mind: When asking teachers and schools to do something new, even if it is beneficial and helpful, you must take away something else they have to do to allow for the needed time. If you continue to add to the responsibilities and requirements, when does it end? When do we get to teach and focus on the students? This is a good recommendation, but it seems idealistic and imposes more work on people who already have so much on their plate. I think the six year review is adequate since schools are doing their own ongoing accountability reports and working to improve. I was also under the impression that if a school isn't meeting the accreditation standards, they were not given six years. But, were looked at again within three years. And if that is the case, you are misleading people with this statement, especially the general public.
2	I would prefer to continue the system as it is currently in place. There is a possibility of an IHE becoming solely focused on the continuing accreditation process rather than focusing on students.
3	Making it an on-going process and requiring action on previous recommendations is a burdensome, unnecessarily expensive process. The decision and process should be based on whether the standards are met and not on the recommendation "whims" of a visiting team. Many times during an accreditation visitation, recommendations are not based on standards and recommendations have no correlation to the standards being assessed.
6	I believe the IHE should be collecting data to use in their visit. Accreditation is a time consuming project. For an institution to be continually providing the information would become burdensome and time consuming. With budget constraints it is already difficult to hire enough personnel to complete the mandated tasks, let alone adding more to the load. There needs to on-going self assessment that is used for the 6th year review.
7.5	The paperwork in responding to accreditation accountability is overwhelming sometimes. It would take a couple full time positions just to handle the workload. If teachers were required to be involved it would take a lot away from their teaching. The term of accreditation should not automatically be six years, it should be based on how well they scored on their self-study and the on site visit. School needing more help and guidance should get a shorter term, they require more work, and someone to check up to see how they are doing with another full visit. Schools that do very well should get the six year, with a one or two day visit to ensure things are still going smoothly.
10	Once every 6 years is sufficient.
18.5	The state is always so short-handed and it is so expensive to get anything done, I do not think this is realistic unless the entire data collection can be done online. What does ongoing really mean? Leave the prior reports alone and ask for a summary of changes that have been made since that visit. It sounds like there will not be any acknowledgement of progress and the past will be held over an institution's head. Let's move on folks.
Exp	4: Accreditation Cycle and Activities 4a: from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years. 4b: to an ongoing system that includes annual data collection by the institution or program sponsor. 4c: Require program sponsors to submit biennial reports to the COA 4d: Enhance and revise the review of all credential program documents to take place in the 4 th year of the seven year cycle. 4e: Retain but revise a site visit in the 6 th year of the seven year cycle 4f: Use the 7 th year in the cycle for required follow up and corrective action.
IHE Role	
0	c) I don't agree with the length of time for this cycle.

	<p>4: Accreditation Cycle and Activities</p> <p>4a: from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years.</p> <p>4b: to an ongoing system that includes annual data collection by the institution or program sponsor.</p> <p>4c: Require program sponsors to submit biennial reports to the COA</p> <p>4d: Enhance and revise the review of all credential program documents to take place in the 4th year of the seven year cycle.</p> <p>4e: Retain but revise a site visit in the 6th year of the seven year cycle</p> <p>4f: Use the 7th year in the cycle for required follow up and corrective action.</p>
Exp	
0	a) I believe we should stay with the old system of a visit once every 7 years.
1.5	c) I believe that reports should be required every 3-4 years rather than every 2. Program implementation needs more than 2 years' data to provide reliable data for informing changes.
1.5	a) As the process is currently working, the lag time for accreditation can be up to 2 years. Moreover, there are major deficiencies in the quality and accuracy of reviews because reviewers are not given adequate, or in many cases, any training. Until there are funds to have multiple, qualified and trained reviewers carefully and accurately review programs, it doesn't make sense to increase the frequency of programs reviews. More unreliable and/or invalid assessments only bog down the system.
2	a) I think once every six years is often enough.
3	c) While the "snapshot" approach may not be the best, making accreditation activities an ongoing cycle would require additional funding and resources (staff, materials, time). This is unrealistic. Unless universities receive additional funding targeted specifically for ongoing accreditation activities (staff salary, materials, etc), then this is not do-able. d) While the "snapshot" approach may not be the best, making accreditation activities an ongoing cycle would require additional funding and resources (staff, materials, time). This is unrealistic. Unless universities receive additional funding targeted specifically for ongoing accreditation activities (staff salary, materials, etc), then this is not do-able.
3	b) This again seems like the responsibility for oversight rests outside the institution. Do we work to please "big brother" or do we have the integrity to address issues continuously and responsibly as program sponsors? c) Teaching and educator preparation is the focus and reason why we should all be here - especially at the higher education level. Preparing multiple reports of data for an outside agency for "compliance" purposes does not seem to me to be a very productive and purposeful use of time.
4	a) Just be careful how much you load on the shoulders of an already understaffed and under resourced institution c) Who exactly will neglect what work in order to prepare more paperwork for otherwise unengaged parties (COA etc.) to review. Bad idea.
4.5	b) Unless additional time (through reducing teaching loads) or considerable technical support is given to schools and programs, the requirement for submitting performance data annually will place an additional and significant time/work burden on program faculty and staff. c) Developing meaningful standards-based assessments is difficult and time consuming. Again, in order to avoid placing unreasonable burdens on faculty and staff, considerable support must be provided by the CSU system, or more flexibility in the types of assessment data or quality indicators must be incorporated into the system.
5	c) Many credential programs offer online (Internet-based) reading methods courses, but is this an adequate way to prepare credential candidates to go forth and teach reading? We should to require colleges and universities to demonstrate the efficacy of online reading methods instruction. I happen to know that National University collects data on RICA passage rates at all National U. campuses across the state of California. They prepare confidential reports comparing passage rates from campus to campus, from instructor to instructor, and can compare RICA passage rates of online classes to the RICA passage rates of regular classes. THEY REFUSE TO RELEASE THE DATA online versus face-to-face instruction data and I know because I have repeatedly applied for access to their data set. National University recommends the most credential candidates in the state and their online courses are HUGELY profitable. It seems to me that National University would be delighted to release this data and prove that online instruction in reading methods is at least as effective as regular (face-to-face) instruction IF IT WAS. Since they refuse access to their data set, it should raise questions. The Commission should look into this and require online credential programs to provide RICA passage rate information for their online classes. Actually, the BEST way to gather

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	<p>this data, however, would be to require the Reading Instruction Competence Assessment test administration company (see www.rica.nesinc.com) to ask applicants to indicate on the application form whether they took their class online or face-to-face in a classroom setting. I wrote letters repeatedly about four years ago asking the Commission testing division folks to work with me on this research, but couldn't get anyone interested. It's a worthy question, especially in light of the recent state and national focus on reading and teaching.</p>
5	<p>a) Again this comes to the issue of time well spent. Faculty should be spending time working on the teaching, and supervision of pre-service teaching. Not preparing for visit. Thus, unless this were truly an ethnographic observation (one in which the observed had no responsibility other than to perform his/her normal duties in the course of his/her daily activities within his/her role) I can not support any increase in the visitations. b) My time is best spent working with pre-service teachers. Unless you have compensation for faculty to do work beyond their jobs, this is unreasonable. And unless the visitations required absolutely no faculty/staff time from programs that are already under resourced, this can only have negative effects on the quality of our programs, and thus on the future teachers, as it will rob resources (time, money, and attention) from instruction and supervision. c) There are no additional resources on our horizon to make such reporting feasible or even possible under the kinds of budget constraints we are working under. Furthermore, I do not believe there is any compelling reason to believe that more data and more reports will lead in any way to better teacher preparation. What on earth would more reports "fix"? It would only rob faculty and staff of time to work with students. d) I do not believe there is a need for additional reviews. I am not certain why it would behoove a program to change the cycle.</p>
5	<p>b) The site visit corroborates the evidence submitted. A short on-site visit does not allow a team to verify the evidence. The physical visit will reveal lacunae not evident in data reports. d) We need to keep accreditation rigorous but simple. Set up demanding data reports with an in-depth site visit in the 6th year. A complex system will demand personnel that neither the commission nor the COA has.</p>
5	<p>a) I do not support this system for programs that are working well. A system that is on probation or in danger of losing accreditation should have greater scrutiny. For those programs performing well, this is an unnecessary, labor intensive and a bureaucratic burden. b) Internally most units collect and analyze data in an ongoing way. To add another level with more time spent in this way is counterproductive. If an institution or unit is not doing this already, then it would be appropriate for the Commission to require evidence that this is taking place. c) Again, my recommendation is to save this for the units where there is evidence to not meeting standards.</p>
7	<p>a) I would like to see more site accreditation visits and less emphasis on submitting detailed annual reports that may not even be read. We need full accreditation visits that include information and feedback from the Commission, not a dilution of this with annual reports providing the appearance of oversight. What is being proposed is well-meaning, but too expensive in time and energy. Reading and digesting these reports in any meaningful way is beyond the capacity of the Commission to implement in a way that would provide meaningful feedback to educator preparation programs. b) We need comprehensive site visits once every four or five years in order to get a true picture of the program (yes, in that time frame), not time consuming annual reports that are unlikely to be reviewed in any way. c) I'd like to see what kinds of information actually will be required for the biennial reports. Will all programs be forced to use the same instruments? Do we have the capacity to modify these instruments (such as the current TPA system) in a timely and flexible manner, or will we be dealing with an elephant that is difficult to change (difficult because of the research and development needed to certify reliability and generalizability, etc). The devil is in the details and the lack of capacity to carry out a rational plan, meaningful to an educator preparation program.</p>
7	<p>a) This university does not have the staff or faculty available to plan for and implement more frequent accreditation visits and preparation of documentation! This preparation is a costly process!!!</p>

Exp	<p>4: Accreditation Cycle and Activities</p> <p>4a: from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years.</p> <p>4b: to an ongoing system that includes annual data collection by the institution or program sponsor.</p> <p>4c: Require program sponsors to submit biennial reports to the COA</p> <p>4d: Enhance and revise the review of all credential program documents to take place in the 4th year of the seven year cycle.</p> <p>4e: Retain but revise a site visit in the 6th year of the seven year cycle</p> <p>4f: Use the 7th year in the cycle for required follow up and corrective action.</p>
8	b) I have been on accreditation visits in which the paperwork was satisfactory but the site visit revealed significant problems. This is especially the case in multi-site universities like National. Accreditation teams need to spend extensive time visiting these campuses to assure that the program delivery is consistent from site to site.
8.5	a) In reality, I DO support an ongoing process rather than a once every 7 years evaluation. However, I am VERY concerned about how this would work and am not officially endorsing it unless it could be done in a meaningful yet efficient manner. What we do now for CCTC does not reflect this kind of approach so I am very concerned about what could happen...
8.5	c) Could be excessive paperwork. If done, someone would have to read and interpret, which may mean extensive staff. d) If the review is in the 4th year, it is a four year accreditation. Would do a complete report at 7 years?
9.5	a) The current cycle is operating well with the addition of joint visits for NCATE accredited schools. As a university with state AND national continuing accreditation, careful attention is paid to ongoing assessment within the university.
11	a) May be too cumbersome without seeing a plan. c) Too often and too prescriptive.
11.5	a) Site visits unnecessary.
11.5	a) The "series of accreditation activities" appears to be time consuming and costly for both the institutions and the COA and CTC staff members who will review all documents. b) I agree with the move to a six year cycle. But I like the comprehensive site visits that are currently in place. With the attention on annual data collection, the institution is marginalized to "document to the test" so to speak, whereas, in a more comprehensive site visit, a program could truly present all that it does, and highlight the success on a number of self determined variables (within the standards). It could also promote its uniqueness. I fear the proposed system will be limiting and not give a holistic picture of the unit. c) The program sponsors currently submit annual reports to CTC for the purposes of Title II reporting. This documentation is tedious, does not reflect the candidate's competence or the institution's performance. Until the COA and CTC reveal the nature of the data to be collected, I am not convinced that reporting "more of the same" will yield any significant data for accreditation reviewers. In addition, compiling this type of information could be time consuming and costly for institutions, especially those whose budgets will not allow extra staff for data entry.
11.5	I am supportive of other options that were items for a decision. I support having a team come to the institution, preferably in the 6th year. This visit is most helpful in having concentrated document review, interviews with faculty, students, graduates, district teachers and administrators. Also this item is too vague about what would constitute a "series of accreditation activities taking place over the course of seven years." b) This item is too vague about what would constitute the ongoing system requirements and what would be the extent of the annual data collection by the institution and program sponsor. The annual data collection is going beyond, say, what NCATE currently requires. NCATE requires annual updates on the NCATE standards in the form of narrative comments; but at this time, required presentation of annual data collection is not required. I am concerned about the time allocation and time commitments of key people for the institution or program sponsor who may be put into a major commitment of assembling reports yearly that are potentially quite detailed reports. Private institutions do not have financial and human resources to put one or more people into extensive data collection activities, when there are several other teaching and administrative duties to fulfill.
11.5	a) My previous answer applies. Until the CCTC stops the unethical for profits through the current system, I do not support any systemic change which will only create more work for us. The cost of this annual or bi-annual reporting would be horrendous...for us and for the state. What bureaucracy will review all the paperwork...or websites? More bureaucracy for schools of ed is not the answer to school improvement in CA. Get rid of mandated text books that

	<p>4: Accreditation Cycle and Activities</p> <p>4a: from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years.</p> <p>4b: to an ongoing system that includes annual data collection by the institution or program sponsor.</p> <p>4c: Require program sponsors to submit biennial reports to the COA</p> <p>4d: Enhance and revise the review of all credential program documents to take place in the 4th year of the seven year cycle.</p> <p>4e: Retain but revise a site visit in the 6th year of the seven year cycle</p> <p>4f: Use the 7th year in the cycle for required follow up and corrective action.</p>
Exp	do not align with the CA standards and which are three or four years too easy. Address poverty, address parent education, lengthen the school year...and school day. Fund after-school programs. Spend the money on something that will change things.
11.5	Support the review schedule... Common standards need to be reconsidered and updated We use the NCATE format so it's a bit more coherent but the common standards are outdated
12	Periodic accreditation is already quite burdensome, probably overly so. Ongoing activity is highly likely only to increase burden rather than spread it out. There should be provision for ongoing or between-cycle engagement with programs in difficulty, but not otherwise.
12.5	a) Additional reporting requirements and visits will take away already limited resources of credentialing programs. Reports and visits become an end to themselves with little value in program improvement. Move to a system with an update on program changes and improvements in the 5th year, a visit in the 6th year and the 7th year as a year to correct any deficiencies.
13.5	d) If the system would change to an ongoing process of evaluation, then having a review of credential documents on the 4th year is a moot issue.
13.5	a) Institutions need time to refine their programs and revise based on locally collected data. A series of accreditation activities would take away time/efforts/resources devoted to local program assessment activities. b) I don't believe the investment of time/resources to respond to an ongoing system would result in any significant information and would justify additional resources from COA/CCTC and the institutions. Invest more time in reviewing initial program documents submitted. c) This becomes an additional burden with little benefit in program improvement. I support periodic reports based on significant documented concerns received by the CCTC/COA. d) Issue of time and resources...
14	a) My concern in this area relates to the comment I made in the earlier section re/ limits of authority and resources of the accreditation body. I have serious concerns about the wisdom of asking the accreditation body to assume such comprehensive monitoring responsibilities of accreditation. Essentially, accreditation should provide the institution with a level of trust on behalf of the state to "carry" it for the term of accreditation. If the standards and outcomes in credentialing are understood by all the stakeholders, universities should be responsible to put these systems in place, use the outcomes regularly, and revise them as needed. This formative process should be reviewed at the point of accreditation. b) I think that the program visits SHOULD be separate from the visits for Common Standards. If also think that both visits should be on a 6 year cycle. c) The question of learning outcomes for teachers remains a moving target. To encumber the COA or other accreditation body with biannual reports (electronic or other) for all credentialing institutions is overwhelming. It also limits universities' capacities to revise and renew their programs because the biennial reports will require such a high level of compliance that the universities' attention may be focused on meeting COA expectations rather than revising their programs in appropriate ways between accreditation reviews. In other words, I believe that excessive reviews (between the "big" reviews) will decrease the universities' capacity to meet the needs of students and the K-12 sector.
14.5	b) I believe that a full-fledged visit is necessary to understand what is going on on a campus. In addition, if only certain programs are singled out for extra scrutiny in the visit, they may garner a bad reputation on campus.
14.5	a) I would support a single visit once every 4 years with follow-up visitations for items determined as exceptions.
18.5	b) I would need to know more about the specific aspects of this proposed change; there is a chance that it becomes simply an annual report with little meaning.
20.5	b) In my experience, too short a visit does not allow the visiting team to deal with issues at the root level. In short visits, I afraid teams would tend to only take a cursory look at issues.

	4: Accreditation Cycle and Activities 4a: from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years. 4b: to an ongoing system that includes annual data collection by the institution or program sponsor. 4c: Require program sponsors to submit biennial reports to the COA 4d: Enhance and revise the review of all credential program documents to take place in the 4 th year of the seven year cycle. 4e: Retain but revise a site visit in the 6 th year of the seven year cycle 4f: Use the 7 th year in the cycle for required follow up and corrective action.
Exp	
22	a) Accreditation preparation is VERY costly to institutions, especially private ones who do not have tax supported staff and faculty to do the extra necessary preparation work. The new emphasis on data collection and analysis will also require BIR members to be more prepared to deal with data and distinguish real data from artificial information prepared to look like data driving decisions (which is happening in the schools now). To use a new, tougher and more focused process is great. To do it more often than every six years is an unnecessary burden on the universities with regard to time and expense. Faculty is hired to teach not to spend a bulk of their time in committees doing accreditation prep. ONLY in the cases where programs did not meet standards should repeat visits be given and then every two years-- program specific-- would be sufficient.
K-12 Role	
0	b) I feel that the three to four day comprehensive site visit should stay in place along with the ongoing system of annual data collection by institutions or program sponsors. If you do not take the time to review by physical observation and evaluations you do not get a complete comprehensive overview. You cannot get a clear, concise picture of the program by a one or two day visit. You need time to review paperwork, data, observe teaching techniques of the program and obtain feedback from both the teachers and the students of the implementation of the program.
1.5	a) Making the accreditation process a series of activities taking place over seven years would have programs putting too much time and energy into reporting instead of administering quality programs. Reviewing collected data should be sufficient.
2	See note for number 3
3	a) This entire process seems to be directed at creating that burdensome bureaucracy. While the overall intent may be to insure accountability, the devil is in the details and these details are onerous.
6	c) If institutions are going to analyze data yearly, I see no point in sending additional reports to the State.
6	a) Site visits should not be necessary. The data should be sent on an annual basis and reviewed every year for changes or possible deletions necessary by legislative action.
8	a) I would oppose anything that lengthens the cycle. Too much can happen in that time span already.
8	b) I think that a four-day visit is too long for the site as well as the visitation committee. Having been on both sides of WASC visits for many years, I believe that three days is plenty! e) What I marked as "do not support" was "retain but revise a site visit in the 6th year of the seven year cycle focusing on Common Standards and where needed, program standards (as determined by the results of the 4th year program review. " That's because I support the first item, "Revise the accreditation cycle from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years."
10	a)The system is now working fine - no changes necessary
10	a) Preparing for current accreditation visits is very time-consuming. I like the idea of spreading out the effort over time, but I would not like to see the series of accreditation activities consume even more time than folks now spend on accreditation.
12	a) The current site visit model allows for interviews and contact with a wide range of students, staff, and community consumers of the program graduates. Shorter visits would seem to limit this valuable time. Much useful information about the true success or challenges of a program would likely be lost in a shorter visit. b) Shorter visits would reduce the opportunity for contact with staff, students, and community consumers of the graduates. These contacts are often the most valuable tools for assessing the effectiveness of programs.

	4: Accreditation Cycle and Activities
	4a: from a single site visit once every six years, to a series of accreditation activities taking place over the course of seven years.
	4b: to an ongoing system that includes annual data collection by the institution or program sponsor.
	4c: Require program sponsors to submit biennial reports to the COA
	4d: Enhance and revise the review of all credential program documents to take place in the 4 th year of the seven year cycle.
	4e: Retain but revise a site visit in the 6 th year of the seven year cycle
Exp	4f: Use the 7 th year in the cycle for required follow up and corrective action.
18.5	a) This needs to be better defined so there is some idea of how this would work in very large and very small programs. How many is a series? Does this include multiple visits with team members? The details are critical here.
22.5	b) The team concept should be maintained in shorter visits instead of one or two program sponsors.
Public Role	
8.5	a) Think that individual programs should be focused on in addition to the Common Standards. Every five years would be better than six.
15.5	b) I strongly support the concept of movement to an ongoing system, but the phrase "possibly a shorter visit" troubles me. I would understand that the visit would be changed in nature and probably involve fewer team members, but I do not think that the actual visit could be much shorter in that the current system only provided for two days of intensive data gathering by team members. I do not see how it could be much shorter.

Exp	5: Unit Accreditation and Program Approval
IHE Role	
2	I think it is fine the way it is.
3	Unclear as to the intent.
3.5	Unit accreditation can mask wide variations in the philosophies and qualities of individual programs. The unit may receive a positive rating when an individual program is entirely inadequate. This can confuse the public. The accreditation should be based on comprehensive and rigorous programmatic standards as well as assessments that are clearly connected to the credential offered. Programmatic review does not obviate the need for judging the capacity of the institution to offer the program, but unit accreditation cannot be a proxy for the comprehensive assessment programmatic integrity and quality.
5	Accreditation should be to see that standards are addressed, not require a whole additional level of bureaucratic oversight.
5	I have always been concerned that universities with multiple credential programs may have the entire unit suffer in the event that one program is experiencing what is hopefully a temporary problem that may be resolved. I do strongly believe that all programs should be held to high standards (not just minimum standards) but if one program is faltering, that program should be called to task without jeopardizing all other programs. Those faculty and administrators who do not have the authority to address programs outside of their purview should not have the quality of their programs called into question because of missteps in another academic unit on campus.
10.5	As long as this can be done in a manner that is cost efficient.
11.5	I still question if unit accreditation is the business of CTC--- programs absolutely are, but true professional accreditation at a high level of standards seems best p[placed at a voluntary national professional level.... the costs of careful and meaningful program review are great, unit review detracts from the program review. Program review is a responsibility of the state (based on federal expectations and tax payer accountability). Alternatively-- oif the state wants to spend its time on unit accreditation-- it could require programs to get NCATE SPA recognition , but then e]=we lose all the unique aspects we value in CA. I just can't see how we can afford to do all of this above a substandard level.
11.5	No Opinion.

13.5	Teacher accreditation needs to be looked at from the perspective that it is a university-wide issue--not only a unit issue. This system needs to be enhanced.
14	I support a process that accredits single programs rather than unit. If a single program is not performing, shut it down. Don't penalize good programs in the process.
16.5	Unit accreditation is valuable. I would consider a system that shifts unit accreditation to NCATE with approval of the NCATE decision by the state. California would maintain program approval and review processes.
K-12 Role	
0	There is already enough tests, courses etc.

Exp	6: Establish consistency in the system by including all Credential and Certificate Programs in the Accreditation Process
IHE Role	
0	I believe we should stay with the old system of a visit once every 7 years.
2	I think once every six years is often enough.
4	General principles are fine but what is this "maintain comparable rigor" stuff. Who's gonna decide if that is valid and reliable.
5	It is not evident why this additional layer is necessary. At what level is it sufficient to trust that programs can evaluate and improve without this process?
9	For those that have national accrediting bodies, the accreditation process should acknowledge that those bodies provide sufficient review of program standards.
11	Comparable rigor across programs may be overly prescriptive
11.5	I may have misread this one-- my concern is the costs of adding induction and BTSA to a system we already can't afford. Everything I believe in says we should, but we've not been able to do the basic job well for several years. Improving the system is a tremendous challenge-- expanding it to ALL credential areas seems impossible.
K-12 Role	
22.5	Having been a professor in the university system and also an educator, administrator and teacher in the public school system I observed that there are too many professors that do not have recent experience or little or no experience in public education. In too many situations there is little or no relevance from the "ivory tower" to the classroom. This response applies to most of the other recommendations below.

Exp	7: Program Standard Options
IHE Role	
0	I believe that standards are developed politically by special interest groups and have nothing to do with the quality of educational programs for our students.
3.5	Only one program standard should be given--the California Program Standards. These standards are the most pertinent to demonstrating that graduates meet the requirements for California. National or Professional Program standards can be used ONLY when the institution demonstrates convincingly with reliable and valid data that the standards used EXCEED the California standards.
4.5	NCATE Standards are written and reviewed in a way that can accommodate state program standards. There is no need to waste time and money to establish comparability on a periodic basis so programs address California-specific standards in addition to the national standards.
4.5	How will "alternate program standards" be defined? Either CA or national standards should be required for all programs.

Exp	7: Program Standard Options
8.5	National standards address California-specific standards. If a program or unit holds national accreditation, no state-specific accreditation program is necessary.
11.5	Must meet California Standards. Should also require NCATE. Should not accept alternate that are less than these...such as TEAC.
12.5	I do not support "alternative program standards" but would require California Program standards which may be complimented by national program standards which would not replace California standards.
13.5	National Standards may no address issues faced by California school systems. For example, the ISLLC standards are lacking a focus on equity and the focus on ELL is weaker than those of California. State standards are developed by California educators but informed by National/International standards.
14	I am very, very concerned about including an option for "alternative program standards". I believe that any program standards for credentialing outside of the California Standards (2042) should have to submit documents that show their alignment with the 2042 standards and these should be reviewed carefully for equivalent values and rigor. It is my understanding that NCATE and the Ca. Standards have been reviewed in this way. I know of no others.
14.5	Communicative disorders programs used to have standards that were pegged to ASHA standards. Joint visits were possible and were efficient and cost effective. That is no longer the case. It would make so much sense for the Communicative disorders standards to be pegged to ASHA standards once again and to have joint visits again be possible. The amount of time that is expended in dealing with paperwork and site visits for two sets of standards is incredible, and that represents time and resources that are not devoted to serving students.
16.5	National accreditation should replace state accreditation of the unit.
20.5	It is my opinion that, in general, all programs should be held accountable to the same standards and those should be the California Program Standards (CPS). How else can anyone be assured that teachers are being prepared for what is specifically important to California? Maybe another alternative would be to have a series of research questions developed on an on-going basis by the COA and/or CCTC and allow program sponsor's to participate in assisting to gather and analyze data related to those questions. In this case the program sponsor would be held accountable to a research design and the collection and analysis of data* in order to gain insight about best practices in teacher education. The engagement in the research process would substitute for being held accountable to the CPS during the duration of the experimental process.
K-12 Role	
1.5	Preparation programs operating in California should all respond to California Standards. This ensures that teachers are prepared for our unique needs, and should simplify transfer from one institution to another.
3	Use California standards only. As an employer, I need to have confidence that the credential meets a certain set of standards, not a series of alternatives which may or may not indicate the competencies I need.
6	Adding National Standards to an already complex review just adds to the difficulty of aligning programs.
6	Use only California Program Standards but ensure alignment with national standards.
6	California only.
7.5	How can you offer these three options and then provide accreditation to programs making different choices? Are the national and professional standards really all that different from the California standards? Part of making these changes is going to have to be some ego-less decisions!
7.5	Many people who go to school in California will live and teach in California, if the standards are different for National then we are requiring too much of the individual. Alternate Program standards need to be specific in order for the individual to know what they need to finish the program. Or California should meet national standards.
8	All programs should follow one set of standards, not have a choice of three.
18.5	Why provide options when you will require periodic evaluation? Either value the other standards or don't make them an option if they will lead to more time consuming follow-up activity to satisfy whoever doesn't trust the other standards body.....we have had this discussion soooo many times.

Exp	7: Program Standard Options
22.5	I like the 3rd option with experimental programs.
Public Role	
6.5	Frankly, as a former instructor who was once badly burned by the California Commission's arrogance (insofar as CA would not recognize my PA SPED credential, my graduate degrees OR my 6 years of superlative teaching IN CALIFORNIA as sufficient to warrant permanent CA certification), I have absolutely no faith in the Commission's ability to extend itself beyond a myopic, Cal-centric, ivory tower sort of smugness which effectively prevents thousands of first-rate out-of-state instructors in high-need teaching fields from relocating to California schools. In other words, you do NOT ask a bilingual teacher with a master's degree (and ABD doctorate) in Special Education and a registered nurse's license who has done outstanding work with minority medically fragile kids for you for YEARS to return to basic ed classes taught by instructors far less experienced than himself. Indeed, if you think that California is experiencing a teacher shortage in critical areas (Math, Science, ESL, SPED) NOW - just wait a few years. A scholastic meltdown is in the offing and I place the blame for it squarely at YOUR feet. It won't affect me, but California will - finally - get PRECISELY what it deserves.

Exp	8: Accreditation Decisions-Program Findings
IHE Role	
5	Many credential programs off online (Internet-based) reading methods courses, but is this an adequate way to prepare credential candidates to go forth and teach reading? We should to require colleges and universities to demonstrate the efficacy of online reading methods instruction. I happen to know that National University collects data on RICA passage rates at all National U. campuses across the state of California. They prepare confidential reports comparing passage rates from campus to campus, from instructor to instructor, and can compare RICA passage rates of online classes to the RICA passage rates of regular classes. THEY REFUSE TO RELEASE THE DATA online versus face-to-face instruction data and I know because I have repeatedly applied for access to their data set. National University recommends the most credential candidates in the state and their online courses are HUGELY profitable. It seems to me that National University would be delighted to release this data and prove that online instruction in reading methods is at least as effective as regular (face-to-face) instruction IF IT WAS. Since they refuse access to their data set, it should raise questions. The Commission should look into this and require online credential programs to provide RICA passage rate information for their online classes. Actually, the BEST way to gather this data, however, would be to require the Reading Instruction Competence Assessment test administration company (see www.rica.nesinc.com) to ask applicants to indicate on the application form whether they took their class online or face-to-face in a classroom setting. I wrote letters repeatedly about four years ago asking the Commission testing division folks to work with me on this research, but couldn't get anyone interested. It's a worthy question, especially in light of the recent state and national focus on reading and teaching. Please let me know if I can participate in research or data collection on this issue!
11.5	This is too restrictive to the TEAM report-- I support the notion if it were to include-- decisions that reflect more clearly individual program findings in the team report, the subsequent response by the program/unit, and deliberations of the COA
K-12 Role	
11	Not sure what you mean here, but I am assuming that individual opinions will be included in final team report. This seems unnecessary; reports can become cumbersome and unfocused.

Exp	9: Accreditation Decisions-Unit Findings
IHE Role	
5	I do not believe that most institutions need more follow up activities in addition to current findings options.
7	Concerns and difficulties could all be raised to the level of stipulations without something between full accreditation and stipulations to muddy the water.

Exp	9: Accreditation Decisions-Unit Findings
9.5	If additional follow-up activities are required that are outside the norm, then I would regard that as a weakness needing addressing in the Accreditation Team Report.
13.5	Full accreditation should be just that. If there are standards-based issues that need to be addressed then full accreditation should wait until the issues are resolved. The 7th year idea would allow this to be a normal part of the process.

Exp	10: Selection of COA Members
IHE Role	
0	I believe that we should leave it as it was. If it isn't broken don't fix it
4	Don't think the commission should select, think it should be an open call and the COA selects
4.5	I am more confident of the national associations representing the education profession at the NCATE council to appoint representatives to policy boards which develop standards, policies, and procedures. I am not confident of our current procedures in CA for selecting competent COA members.
5	Expand the number of members on the COA.
13.5	While I actually agree on the selection of COA members, I believe that a system that hastily brings together a group of people to do such an important job is an inadequate system. Perhaps, getting out of the box to review this selection process may be one of the most important issues in redefining the accreditation system that is actually in place.
18.5	The COA should be eliminated and the team reports should go directly to the CTC. The team report should be the binding decision.
22	The basic idea is good IF the selection pool for the COA is limited to members from the BIR with five years or more experience. This will also help to prevent political appointment temptations by commissioners.
K-12 Role	
22.5	Once again I believe that selection should be based on competence rather than on #'s

Exp	11: National Unit Accreditation
IHE Role	
4.5	I have participated in a merged visit for NCATE and CA accreditation. A merged visit does not eliminate duplication of efforts, and the NCATE process was more powerful for opening communication and for leveraging support to improve programs than was the CA process.
4.5	If we are serious about upgrading the quality of teacher education in California make California accreditation and national accreditation mandatory for all California teacher education programs.
4.5	If national accreditation is sought, this should satisfy the CA requirement with the exception of standards that are very specific to CA. Even the current merged visit requires the preparation of differing materials and is quite complex and time consuming.
6.5	Only if national requirements match California which has most rigorous requirements in nation.
8.5	Currently merged visits require units to prepare a huge amount of documentation, often requiring the same information in two formats. If a unit is nationally accredited, state accreditation is unnecessary.
9	Use national standards and reviews in lieu of CA visits... for instance, in the area of school psychology
K-12 Role	

Exp	11: National Unit Accreditation
7	I have served on a number of merged visit review panels. Each time I am amazed that the State of California seems to be abdicating their responsibility for accreditation to NCATE. The state team seemed to be present to support the work of the national team. I do not think NCATE supports the same high standards the state is trying to achieve through the suggested revisions.
10	Local control is a better system.
22.5	There are such vast differences between States that the national accreditation almost seems meaningless. We should however insist on a strong state process that complements national standards.

Exp	12: National Program Accreditation
IHE Role	
4.5	It can be left up to schools to demonstrate to NCATE reviewers that NCATE accreditation is coordinated with the CA standards.
4.5	Is there a reason not to accept national accreditation in lieu of California accreditation?
4.5	Again--if a program has received national program accreditation, that should suffice.
5	This prompt raises interesting possibilities and I believe that it is worth considering what it might mean for a program to be nationally certified without state accreditation, and whether credentials offered might be considered in the same ways that out of state valid credentials are currently handled.
6.5	Requiring California accreditation when the program has national program accreditation seems redundant and a poor use of limited resources. Many, if not most national program accreditation is very rigorous. In some cases, California has additional standards or requirements. Wouldn't it be a better use of resources to focus any California accreditation processes on the non-overlapping standards?
8.5	Per my earlier comments
8.5	California should support national program accreditation by allowing units to choose to earn this accreditation without the burden of having to try to coordinate national accreditation with a California process.
9	Use national standards and reviews in lieu of CA visits... for instance, in the area of school psychology
14.5	I would advocate that joint visits with ASHA be allowed again.
K-12 Role	
10	Support from stand point of IHE. There are no national induction programs that compare with the sophisticated, research based system in California. Language should read: ...all IHE California Credential programs must....

Exp	13: Evaluation of the Accreditation System
IHE Role	
0	I believe that we should leave it as it was. If it isn't broken don't fix it
5	This is cumbersome and unnecessary for most strongly performing units who already have a system in place to assess program performance with the goal of continuous improvement.
9.5	I can not support the CCTC becoming a repository for ongoing data collection. A university must be free to analyze long-term trends without feeling that changes must be re-justified every two years to another agency.
14.5	Again, I am generally in favor of the idea but believe that ASHA annual reports should represent the submission from communicative disorders programs.

Exp	14: Training -- Board of Institutional Reviewers (BIR)
IHE Role	
0	I believe that we should leave it as it was. If it isn't broken don't fix it
4	Make more work for the COA, right?
5	I do not believe that this process or training is necessary for most institutions.
9.5	I cannot support the revised suggestion of an ongoing collection system and therefore cannot support this question.

Exp	15: Selection of the Review Teams
IHE Role	
0	I believe that we should leave it as it was. If it isn't broken don't fix it
2	Not necessary as I do not support the new system.
9.5	The current composition of the CCTC gives a diversity of thought across all programs. This is vital in making accreditation decisions. The input is also important across K-12 and University team members. A smaller team would lack the current ability for diverse discussion.
14.5	I do believe in joint visits for communicative disorders programs. However, I do believe that each program should have its standards evaluated on site periodically.

Exp	16: Selection of Interviews and Site Visits
IHE Role	
0	I believe that we should leave it as it was. If it isn't broken don't fix it
2	Not necessary as I do not support the new system.
5	Since I don't support the revised system I don't support the revised guidelines.
9.5	I cannot support the new recommendations for ongoing review of the university by another agency. There is already ample evidence submitted to CCTC and the Cal State System that could be utilized, rather than every university supplying another report on its own.
14.5	I would keep the previous framework but allow for less frequent visits.

Exp	17: Data Collection
IHE Role	
0	The word "brief" is too ambiguous.
0	I believe that we should leave it as it was. If it isn't broken don't fix it
1.5	I am concerned about the biennial requirement. What exactly is meant by "brief"?
2	Not necessary as I do not support the new system.
3	Why are we trying to add to our accreditation workload??

Exp	17: Data Collection
3	Funding and resources to the universities need to be provided.
3	In reality, an institution would focus only on the area under review. What about all the others? Education of our students and the programs in which they enroll need to be integrated and viable. All aspects of a program should carry equal weight.
4	More work for understaffed and under resourced institutions. I resent all the burden being placed on the institution. The whole thing is a full employment program for COA and Commission. I support the dissolution of the Commission and the choice for state or national accreditation.
4.5	Same issues of which competencies are measured, how they are accurately and reliably measured, and the level of assistance from CSU system.
4.5	I support the biennial reports but: This item, as worded, is so vague, all-encompassing and non-specific (e.g., "periodically" "could designate" "appropriate advance notice) that I cannot support it.
4.5	Annual data is enough. This permits comparison across institutions and within the institution.
5	The report should be substantial. It is unfair to change the standard area. All the areas should be established. Data collected. Then, extraneous data areas could be reviewed after analysis.
5	This adds an additional layer of unnecessary bureaucratic activity for institutions that are performing well.
7	Submitting biennial reports is costly to an institution in human resources. We do not have the faculty or staff to spend time on developing data for these reports!
7	Be careful of work load increases on program personnel.
8.5	I strongly support data collection, and an annual or bi-annual reporting process. However, the statement was not clear, and was too exact for this stage of the revision process. Exactly what will be reported and how often needs investigation and reflection time.
9.5	I cannot support the new recommendations for ongoing review of the university by another agency. There is already ample evidence submitted to CCTC and the Cal State System that could be utilized, rather than every university supplying another report on its own.
11.5	I cannot support this biennial reporting of data until I understand the nature of the data being requested. Currently, candidate competence is being submitted annually for Title II reporting, and I do not believe this data serves any purpose. It is a waste of institutional time, CTC time, and certainly doesn't reflect anything about institutions or programs. To create yet another system that could potentially consume time and money for the sake of documenting something that may have little meaning isn't supportable. I would, however, support periodic reporting of narrative explanations related to specific standard areas, with program chosen data to support the self-review.
11.5	Seems arbitrary and capricious to "periodically select".... adopt standards, stick to them, or if you MUST do this-- ensure 18-24 mos advance notice.
11.5	This item seemed too vague in the area of initial cycles, with the focus on candidate competence and related assessment standards, and vague in the last sentence about the designation of a different standard to be the focus of a report. I would like to suggest that if an institution does also have NCATE accreditation that the protocols for NCATE yearly reporting be accepted for California, without additional reporting. Also, institutions that are members of AACTE also do the PEDS collection, so maybe some of the AACTE information could be shared with CCTC. While I don't opposed some form of yearly reporting, I would like more specificity about what information would be required, and again, I wish to express concern about financial and human resources at small institutions to allocate time for what could be extensive reporting.
12	Periodic accreditation is already quite burdensome, probably overly so. Ongoing activity is highly likely only to increase burden rather than spread it out. There should be provision for ongoing or between-cycle engagement with programs in difficulty, but not otherwise.
12.5	I believe that creating a system that demands more reports does not ensure quality of programs, but rather takes away resources from programs. Reports are particularly lacking if there is no response in a reasonable time frame. Given the current budget situation, it seems like a misuse of resources to put limited resources into report review versus program development, improvement and expansion.
13.5	Additional data as described in this recommendation do not justify the resources that would be required to comply. The benefits of such data are limited

Exp	17: Data Collection
	and create additional unnecessary investment of time and resources for institutions and would require additional State resources to accept and analyze data.
14	If the COA develops a biennial web-based report, and the focus is on candidate competence and other related assessment standards, it seems to me that we will be reinventing the wheel. We already have performance assessments and other assessments in place (TPA, RICA). IF the universities are using a summative performance assessment, then I wonder what other quantifiable assessment will be used and reported at the biennial report point. I urge the Accreditation Working Committee to carefully consider what has happened with the RICA report, where we see such high pass rates. Surely some universities are finding ways to eliminate some students from their data by designating them as non program-completers, though they may have finished requirements other than RICA. In other words, if you put another report in place, I am questioning whether this report will actually enhance program quality and improve student learning outcomes. Before the accreditation working committee recommends another report of this nature, I think it would be critically important for them to put a prototype out for review. What evidence will be required that isn't already in use in currently approved 2042 programs for the final credential recommendation?
14.5	Please see prior remarks. It would be extremely helpful if communicative disorders programs could submit the ASHA annual report.
19	See previous note about lack of CCTC capacity. We are in danger of having programs focus more of their attention on data collection and less on service to candidates. For what purpose? Will weak programs ever be closed?!
K-12 Role	
0	No more stress and paperwork! We need real solutions not more of the same!
1.5	Again, I do not see evaluation in the preparation institution's role.
2	Making it an on-going process and requiring action on previous recommendations is a burdensome, unnecessarily expensive process. The decision and process should be based on whether the standards are met and not on the recommendation "whims" of a visiting team. Many times during an accreditation visitation, recommendations are not based on standards and recommendations have no correlation to the standards being assessed.
7	Once each year.
Public Role	
8.5	I think the data currently collected is sufficient, but has not always been presented in a helpful manner to the institution or the COA. I would prefer that particular programs be a "focus" than a standard area so that more equity is provided from the institutions to small programs.